

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

QUALITY PLUS SERVICES, INC.,
Plaintiff,

v.

Civil Action No: 3:18-cv-00454

NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA.,
Defendant.

**QUALITY PLUS SERVICES, INC.'S MOTION TO EXCLUDE TESTIMONY OF
DEFENDANT'S EXPERT, ROBERT ANDERSON, JR.**

Plaintiff, Quality Plus Services, Inc. ("Plaintiff" or "QPS"), by counsel, hereby moves this Court for entry of an Order excluding the testimony of Defendant's expert Robert Anderson, Jr. on the bases that Mr. Anderson's threadbare *ipse dixit* conclusions fail to meet the standards required by Federal Rule of Evidence 702 for the admission of relevant and reliable expert testimony, and because Defendant National Union has failed to comply with the standards of Federal Rule of Civil Procedure 26(a)(2)(B). For these reasons, and as stated in the accompanying and Memorandum in Support of Its Motion to Exclude Testimony of Defendant's Expert, Robert Anderson, Jr., Quality Plus Services, Inc. respectfully requests that this Court grant its motion and enter an order excluding Mr. Anderson's purported expert testimony in whole.

Dated: April 4, 2019

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of foregoing was served via Notice of Electronic Filing this 4th day of April, 2019 on the following:

Benjamin Eggert
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/s/Nathan A. Colarusso
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